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10 RONALD CUPP

11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA – OAKLAND DIVISION**

13 RONALD CUPP, an individual,
14 Plaintiff,
15 vs.

16 COUNTY OF SONOMA, a municipal
17 corporation; TENNIS WICK, in his
18 individual and official capacities; TYRA
19 HARRINGTON, in her individual and official
20 capacities; MARK FRANCESCHI, in his
21 individual and official capacities; TODD
22 HOFFMAN, in his individual and official
23 capacities; JESSE CABLK, in his individual
24 and official capacities; ANDREW SMITH, in
25 his individual and official capacities; and
26 DOES 1-50, inclusive.

27 Defendants.

CASE NO.: 4:23-cv-01007

**DECLARATION OF ERIC G.
YOUNG IN OPPOSITION TO
DEFENDANT COUNTY OF
SONOMA'S MOTION TO DISMISS**

Date: June 29, 2023
Time: 2:00 p.m.
Courtroom: 6, 2nd Floor
Judge: Jon S. Tigar

28 I, ERIC G. YOUNG, declare:

1. I am an attorney duly licensed to practice law before all Courts of the State of California. I am admitted to practice before this Court. I am the attorney of record for the Plaintiff in this action. If called upon, I could and would competently testify to the matters stated herein from my own personal knowledge, except for those matters which are stated on information and belief. As to those matters, I believe them to be true.

YOUNG DECLARATION IN OPPOSITION TO DEFENDANT COUNTY OF SONOMA'S MOTION TO DISMISS

1 2. Attached hereto as **Exhibit 1**, and incorporated herein by this reference, is a
2 true and correct copy of an organizational chart for Permit Resource Management
3 Department (PRMD) showing the current hierarchy of the Department, including the
4 position of the PRMD Director, Defendant Tennis Wick, and the Code Enforcement
5 Manager, Defendant Tyra Harrington. I submit this chart to the Court to help the Court
6 visualize the structure of PRMD, its various divisions, and the position of its officials. I
7 obtained this organizational chart on April 20, 2023 from the County's official website
8 located at the following address:

9
10 [https://permitsonoma.org/Microsites/Permit%20Sonoma/Documents/Divisions/
11 Administration/OrgChart/Permit%20Sonoma%20Organizational%20Chart.pdf](https://permitsonoma.org/Microsites/Permit%20Sonoma/Documents/Divisions/Administration/OrgChart/Permit%20Sonoma%20Organizational%20Chart.pdf)

12 3. Attached to the Complaint are six (6) affidavits/declarations from individuals
13 who have been adversely affected by PRMD's Code Enforcement activities, similar in
14 nature to those alleged in the Complaint. Since obtaining these initial six declarations, I
15 have obtained five (5) more as well as a supplemental declaration from one declarant,
16 Elias Stavrinides, detailing additional constitutional violations by PRMD officials.

17 Attached hereto as **Exhibit 2**, and incorporated herein by this reference, are true and
18 correct copies of these additional declarations, which I have obtained.
19

20 4. In addition to these individuals who have been willing to go on record about
21 their interactions with the County, I know of at least 10-20 additional persons who have
22 been adversely affected by PRMD under circumstances similar to the allegations made by
23 Plaintiff. These are individuals from whom I have either not yet had an opportunity to
24 obtain declarations, or they are fearful of reprisal from the County if they come forward.
25

26 5. I sent a Public Records Act Request to the County on or about June 24, 2022 as
27 part of my investigation into the allegations in this matter. Among other requests, I made
28

1 certain requests for information by property address. In mid-July, I spoke with Deputy
2 County Counsel, Holly Ricketts, and was told by her that PRMD did not keep records by
3 property address, so the County either could not comply with the PRA request, or it would
4 be cost prohibitive for me to pursue the request (although a specific cost was never
5 provided). Subsequently, I came into possession of a spreadsheet that is 8,131 pages when
6 PDFd showing open violations by property address in the County of Sonoma. Due to its
7 length and the presence of personally identifying information about individuals with
8 outstanding violations in the County, I have not attached the spreadsheet as an exhibit to
9 this Declaration, but I am happy to provide it to the Court on a thumb drive, disc, etc. I
10 believe many, if not all, of these individuals have also been affected by the policies and
11 practices of the County Plaintiff alleges in his Complaint. For that reason, I believe this
12 matter may well be better pleaded as a class action, and I respectfully request leave to do
13 so.
14

15
16 5. Whether as a class or not, I do not believe that Plaintiff's allegations are isolated
17 incidents. I will be filing additional suits on behalf of affected property owners who are
18 willing to come forward with allegations. I believe Plaintiff has additional claims he can
19 make which are not part of the present Complaint, which I would like an opportunity to
20 amend to include in this suit.
21

22 I declare under penalty of perjury that the foregoing is true and correct
23

24 Dated: April 20, 2023

YOUNG LAW GROUP

25
26
27 By: /s/Eric G. Young, Esq.
ERIC G. YOUNG, ESQ., Attorneys for
28 Plaintiff RONALD CUPP

EXHIBIT “2”

Cupp v County of Sonoma

DECLARATION OF MICHAEL CASTAGNOLA

I, Michael Castagnola, declare as follows:

1. The matters set forth herein are based on my personal knowledge and if called to testify in this matter, I could and would competently testify thereto.

2. My name's Michael Castagnola, I have lived at 12778 DuPont Road, Sebastopol, CA 95472, for 35 years. I raised my family here. I have been a public servant and was Captain of the San Francisco Fire Department for 39 years, living here and commuting to San Francisco. Now I am an elder wishing to enjoy my God given right to retirement and unobstructed use of my property. I consider myself a good citizen of Sonoma County.

I now must worry about the over \$550,000.00 fraudulent abatement liens and the Code Enforcement under the PRMD have caused a receivership to abatement false claims on the property. This process has been methodically engineered to Sonoma County's favor to garner and repossess my property. It is abusive and wrong to witness the lawlessness of how code enforcement agents have operated. I have asked for a meeting with Lynda Hopkins, Supervisor, to seek relief once and for all from this torture.

My tenant and guest were displaced from their home by code enforcement agents, government employees, that were supposed to work to protect and keep safe the people of this County. My story is long and has been going on for a few years beginning after we trusted and allowed Tyra Harrington, Code Enforcement Manager on our land to inspect a false complaint.

Now a supposed inspection that occurred on 4/11/2023 and by the nature of their illegal actions, evicted two persons from their respective residents on my property. There was no notice of any kind that preceded that action that would allow that to occur. Tenants' rights were violated. They were never given notice at all. Who would allow anyone to evict tenants with absolutely zero notice. I know this is illegal on its face because due process was never given.

If I am expected to follow the rules whatever their form takes, why should I not expect these actors to do the same!?

From that moment on we have dealt with her misrepresentation of information, lying and using extortion methods to threaten us into paying excessive fines. I have all the incriminating information and details outlining the lies and extortion with evidence signed under penalty of perjury in document(s).

Back when this began, we tried to seek a remedy, to no avail, from code enforcement agents. Instead, they did everything in their power to sabotage and make it impossible to work in abating our violations. I have felt it is all revenue generated instead of in the interest of solving public and citizen problems.

One of the incidents that clearly shows a pattern of practice, is when my small hoop house under no code requirements needed a permit to build was embellished by Tyra Harrington on the official paperwork as having running water and electrical. Which was falsely recorded and a blatant lie. According to code requirements, the size and footprint of this hoop house didn't need a permit to build and she tried forcing us into paying \$1200 to pull a demolition permit to remove it.

Not only are we dealing with lies and extortion, but she was also forcing us to compromise part of my daughters farming system that she uses for seed germination in the early spring. For years she had a small local farm stand and restaurant accounts, and she's always grown food on our property for our family and community. I live in the fifth district where our supervisor representative Lynda Hopkins says she supports local farmers and is herself a farmer.

In our efforts to abate the current violations, I feel we have proof and documentation in the form of pay stubs and emails that prove all our efforts to work with code enforcement has been mitigated in their favor.

Also I am wondering why the head and code enforcement officers are ex law enforcement agents, with no knowledge of building codes, are put in charge. They strictly come off as revenue agents. It seems people in these positions should be bonded contractors since these matters directly have to do with California building codes and laws.

Also, County of Sonoma by its' Code Enforcement managers by its personnel continue to fly drones to spy and search people's property without warrants, exigent circumstances or just plain manners. It is so frustrating to realize that we are always available to be watched, searched and spied upon by the government without warrants. What is up with this?

After years of dealing with this, I have suffered as two of my tenants and people helping me caretake and manage the land are displaced from their homes by the California Receivership Group and code enforcement agents who were appointed by the Sonoma Superior Court after hearings using false and tainted evidence by County Counsel based on Code Enforcement lies, against me.

This receivership nonsense all started after hearings stated above, and having the Receiver gain illegal entry onto my property, with malicious intent to engage in destruction of property, pulling all the wiring from one of my tenants home office. They also engaged in cutting her water supply with a hack saw cutting into the pipe making the repair exceedingly difficult to reestablish fluidity and compromising her sustenance. They gave us notice with a time and then came on our land two hour prior to their assignment. They arrived wielding their paperwork acting like thugs and gangsters (which we have full video and audio documentation and witnesses). All in the name of "Health and Safety" which is their buzz words to allow them to do what they want.

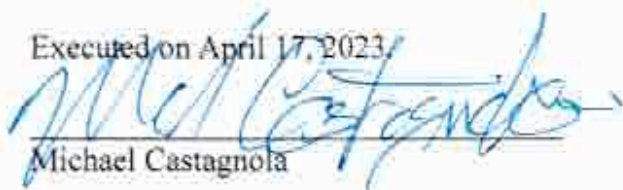
This is happening when the state of California is putting pressure on Sonoma County to allow and provide more housing for displaced individuals being victims and others being ravaged by fire. There have even been a few articles and In a Sonoma county file number #2023-

0224 where there is discussion on allowing different types of manufactured and temporary housing to be left alone.

Plainly put all the actions of this SONOMA COUNTY "GOVERNMENT" WERE ACT OF EXTORTION AND FRAUD.

I declare under penalty of perjury under the laws of the State of California and the United States that the foregoing is true and correct.

Executed on April 17, 2023.



Michael Castagnola

DECLARATION OF ALAN LONG

I, Alan Long, declare as follows:

1. The matters set forth herein are based on my personal knowledge and if called to testify in this matter, I could and would competently testify thereto.

2. My name's Alan Long. I have rented and lived at 6905 Hwy 116 South, Cotati, for darn near 30 years now, at the same location. I have worked in construction as a carpenter and cabinet maker my whole career. I consider myself a good neighbor and citizen of Sonoma County.

On September 7, 2020 in the morning the County of Sonoma put a violation notice on my mailbox. It was from Todd Hoffman for violation for cultivating marijuana.

We notified our landlord who contacted Todd Hoffman directly, and we tried to comply with everything he wanted. Had instructed us to take everything down and send him photographs. We did that. And he gave us from like at five o'clock in the evening when we finally got the final thing, he wanted everything down by midnight that day and pictures sent to him. We complied with that (the phone number he gave us was the wrong one). So the next day we talked to him and he said he didn't get any photographs. So we sent them to the number. He said that's the office line and not the line to send the pictures on. So we took pictures back to him and he replied that there was still marijuana growing in the greenhouse, which was not true.

Everything was taken down and removed. And we tried to comply with all that they demanded and none of it seemed to be good enough for him. We made an appointment with him and agreed to have him come out and inspect the barn that had marijuana in it.

He and his goonies came out to inspect and they acted like Nazi Gestapo with real bad attitudes, and a superiority complex. He wanted to know where all the marijuana went. I told him, "You told us to get rid of it. We did. Everything went to the dumps." Hoffman was mad it was taken down and gone. He wasn't happy with that either. Because he couldn't gather any evidence. There were no leaves on the ground. So he was upset about that. We just wanted to comply, and did.

Then he demanded and wanted to go into other buildings on the property, my landlord said he wasn't here for that, only to check the marijuana site. . So I asked him to please leave, but my landlord with pissed with Hoffman's attitude and told him to "Get the f**k off my property."

Hoffman said "you'll be sorry for that. I'm not done with you yet. I just getting started, and I will write you up!". That day we received another five or six violations on the next door property for a bunch of bullshit and was given a short period of time to make all that right, which we did and complied.

Hoffman said all the evidence that he got was from satellite and drone images. All we know about is the drone, because the satellite from Google Earth was two years ago (old) before they updated it. But the drone pictures, we got statement in an email from Hoffman that all the

pictures were taken from a drone. Hoffman and the County flew drones over our property over a half dozen times.

Our property is next to the Highway 116. We were not given a warrant or proof of a permit from Caltrans, which Sonoma County does not have a statute on drone flight, or agreements with the other agencies. So Sonoma County has to go by state and federal law. And both state and federal law state that they cannot use a drone for reasons of fighting a crime, only for health and safety. But even the police can't do it without a warrant, unless it's a violation or exigent circumstances that they've been doing for a long time, they have to have permits and warrants. So we confronted Hoffman with that and he pretty much told us to "go f**k ourselves, that he can do whatever we want".

We tried to comply with all this stuff and all we got was the bullshit attitude in return. We went up to the County Administration to try to have a meeting with Tyra Harrington (Hoffman boss) and she was bitch to us also. She treated us like sh*t. She said all she wanted to do was talk about the fine. She did not want to talk about the violation, giving rise to a fine. The violation was the actual growing of the marijuana. And it was taken down that day?

I really don't understand, government is supposed to help the people. We tried to be good citizens and comply. My mom was a public servant and worked her whole adult career at the Town of Corte Madera, in the Town administration and then in the Town of Corte Madera building department. It was always about helping the Town citizens. I have never been treated with the loathing and disrespect and condescending that I have been between Todd Hoffman and Tyra Harrington.

Sonoma County should be ashamed of themselves.

I declare under penalty of perjury under the laws of the State of California and the United States that the foregoing is true and correct.

Executed on April 12, 2023.



Alan Long

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I, ELIAS STAVRINIDES declare as follows:

I have personal knowledge of all facts stated in this declaration, and if called to testify, I could and would testify competently thereto.

1. September 14, 2022, at approx. 9:54 a.m. while parking my vehicle at my house at 970 Butler Avenue, Santa Rosa, CA and heard a strange buzzing noise that I recognized to be a drone.

2. Looked up and witnessed the drone flying over my property. It hovered over some trees and rotated for a second, then moved again and hovered again. Approx 3 times that I witnessed.

3. I waited and watched for approx. 10 minutes, it then flew back over my property and began to descend. I jumped into my truck and went to follow the drone. I came upon a blue truck that I recognized as Todd Hoffmans truck. I approached the truck and witnessed Jessie Cablk controlling the drone. Todd Hoffman was sitting in the truck driver's side.

4. Todd Hoffman then turned on his emergency flashers (they were parked into private property; front of the truck sticking out into the street. I assume without permission). I then confronted Calbk on why he was again flying over my property searching without permission. I asked them if they had a warrant? "Hoffman stated they did not need one". I asked them "are you taking video and pictures of peoples property again?" Hoffman stated, "they don't have to show me anything", in a condescending manner. I told them I will see the pictures, and Hoffman gave me a condescending wave of his finders that he was done with me now.

5. I took a video of the drone flyover and our conversation between myself and Calbk and Hoffman.

6. On information and belief neither County or its officials first obtained a warrant or my consent, and no exigent circumstances existed before flying the drone over my property.

7. On information and belief, the drone took photos and or videos of the property.

8. In addition, County and its officials also conducted prior, warrantless drone flyovers at my property on several occasions.

9. On 9-14-22 filed a claim with the County of Sonoma. County denied 11-9-22.

10. On 11-19-22 filed a Public Records Act request, Second request 12-11-22, Third request 3-14-23, and Fourth request 3-22-23. The previous requests I only received a couple of pictures of a neighbor's property, they state no video was taken, and that they did not fly over my property even though I have the flight over my property from my own video I took with my phone.

I declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct, and that this declaration was executed on April 10, 2023.

Signature:


ELIAS STAVRINIDES

ELIAS STAVRINIDES
970 BUTLER AVENUE
SANTA ROSA, CA
707-483-7689

DECLARATION OF KENI MEYER

I, Keni Meyer, declare as follows:

1. The matters set forth herein are based on my personal knowledge and if called to testify in this matter, I could and would competently testify thereto.
2. My name is Keni Meyer, I live at 639 Duer Road, Sebastopol California (APN 060-020 – 037), on October 18th 2018 inherited this four acre parcel of property,

I love animals, especially horses and dogs. I had a desire to improve my rural country property and put in a horse arena and dog training area, to do my passion with animals. This is for my private use, and not a commercial business or for access by the general public.

On 1/02/2019 My contractor, Anthony Judge from Olympia Footing, and I went to the permits department to get a grading permit for a small horse arena that I wanted to build on the Southwest side of the property. We were told by the permits department we did not need a grading permit for an arena of that type and size. We were told because we were not actually erecting any walls for a building no grading permit was needed.

On or around 1/20/2019 we started building the arena. The neighbor next on the southwest side of the property filed a complaint with the County of Sonoma code enforcement questioning if I had the right permits to make the arena.

On 2/11/2019 I received a violation vgr19-0018 posted on my fence for unpermitted grading with the flood prone urban area.

On or around 2/11/2019 My contractor Anthony Judge and I went to talk to Sonoma County code enforcement again, bringing plans. We made an appointment for an inspection of the arena.

On or around 2/11/2019 Ryan (last name Pedarelli?) the County PRMD building inspector came out and inspected the arena, signing it off without a grading permit and giving us permission to finish the project without a grading permit. He stated I did not need a grading permit as we did not move more than 50 cy or construct anything. But I would have gotten a permit if code enforcement would have required it.

On 6/26/2019 in the afternoon I noticed a strange scary man with a shaved head and covered with tattoos trespassing wandering on my property. I thought he was a white supremacist and he frightened and scared the hell out of me. I approached him and told him to leave. He told me he was Todd Hoffman from code enforcement. He was rude and had an attitude. I asked him for identification, and he said he had no identification on him. I told Todd to get the fuck off my property and he told me he could give me 10 violations because of this. These are the following violations he gave me.

Vbu19-0382 deck to access second story

Vpl19-05255 fence exceeding 3' in front yard.

Vpl19-0526 - occupied travel trailer

Vpl19-0527 - occupied travel trailer

Vrg19-0034 - 6-26-2019 - Grading violation in excess of 50 cubic yards. This re-opened the grading violation the Ryan had come out and inspected and closed.

The harassment continued.

On or around 7/18/2019 Todd Hoffman came back to my house and was at my gate demanding to see my septic. I had no notice, and he was not scheduled. I refused to let him in as I was leaving for an appointment. I told Todd Hoffman there was no problem with the septic, and he gave me a violation "self-proclaimed septic and leach field failure".

Vws19-0028 septic leach field failure.

I was told by Todd Hoffman to get a septic test done. I have good intentions and wanted to comply so I could improve my own property. The letter he gave me was ambiguous and did not specify that I needed to be done by an engineer. On 7-29-2019 I hired Joe Farmers septic to come out and we dug up the box to the box that connects the septic box to the leach field and tested the drainage of the box and field, this cost me \$1200.

Todd Hoffman and Holly Rickett (a county attorney) found paperwork from the 70's saying the septic did not perk and would need to be tested every year. They failed to recognize that in 1980 the septic was permitted and put in and a dome house was built on the property. I have an email from Holly Rickett stating that if I got a tier 1 report done on the septic by an engineer that they would close the violation with no penalties. On February 1, 2022, I hired Mike Treinen (Engineer and ex county employee) he came out and did both a tier 1 and Tier 2 test on my septic. My septic passed with no problems and stating the obvious that there had never been an issue with my septic and Mike also made clear that during my lifetime there never would be a problem with the septic.

The harassment continued.

On or around 5/21/2020 My lawyer Elizabeth Reifler made arrangement for Sonoma County permits department to come out and inspect the deck to access 2nd story vbu19-0382. It was not clear what was illegal about this deck. This was to be inspection ONLY agreed upon the County council lawyers (Holly Rickett) and code enforcement. After this inspection. I was given another violation (by Hoffman) on the deck to second story again and now also the stairs leading up to the deck. And a new violation on the first story addition under deck south side.

Vbu20-0277 - Second story deck with stairs

Vbu20-0278 - first addition under deck south side.

The new violations I just received was not issued a number. It was issued 5/14/2020. Elizabeth Reifler, my attorney, appealed this violation within the 10 days. I also have an a finalized permit from 12/31/1980 for the south side of the dome that has been emailed to Todd Hoffman, Mike Carey, Holly Rickett, Sharmalee Rajakumeran. The permit is for the south side of the dome and should eliminate all violations regarding the south side of the dome the deck and the staircase. I was not given a hearing even though the appeal was submitted within the 10-day period. The violations remain open.

I'm not sure when these violations were given a number, but I was able to get the number off of the PMRD website, when I talk about the trespass pictures taken without permission below.

The harassment continued.

On 9/19/2019 there was a violation notice on my fence stating I was running an illegal dog training facility. This violation was closed due to the fact that the woman on the property had submitted a flyer stating a grand opening of a dog training facility with my address on it. This violation was closed because the flyer did not have a business name that I was associated with, nor did it have a phone number that was associated with me. Nor was the dog on the flyer any dog of mine. Vpl19-0903 unpermitted canine training facility.

I have seen the correspondence between Holly Rickett and Elizabeth Reifler closing this violation based on throwing out the Flyer turned into PMRD. And the violation VPL19-0903 was closed because of this.

The harassment continued.

VPL21-0021 4/30/2021 - Diane Gomez County Deputy Attorney found an old Groupon of an old dog training center I had in Santa Rosa in 2012. She called me for agility lessons, and I informed her *that I no longer teaching but if she would like to come over, I could get her started at no charge*. I was re-violated on having a commercial dog training center because of this entrapment by Diane Gomez.

Please note we were still shut down because of covid, I was very sick on and off throughout the year 2021 and I had already been violated.

The harassment continued.

During the early 2021 my father was deathly ill and living with me on my property and I was his caregiver. While this was going on, the County continued to post handwritten notes, I was served by process servicer, etc. I had no quite enjoyment of my own property.

The harassment continued.

On 3/13/2020 I signed an abatement agreement between me and Sonoma County PMRD for the purpose of financing so I could pay the fines and get the work done the County was demanding. The county lifted the abatement liens against my property and then the county promptly shut down due to covid. I finally got a hard money loan in July of 2020 my lawyer emailed the county so we could work out the details of the abatement agreement. I was supposed to pay them \$17,000.00. They were out of the office indefinitely. In July of 2021 I refinanced my loan paying off the old loan. I then did get ahold of County, made an appointment, and went to see them with my contractor Norm Detels. I was not aware at the time that Holly Rickett was removed from my case Sharmalee Rajukumaran was put on as acting lawyer.

On September 6, 2021, my lawyer Elizabeth Reifler passed away.

The harassment continued.

Elizabeth Reifler made several attempts to contact the county during covid to no avail. Sharmalee was aware my lawyer passed and met with me anyway.

Again, I had no idea Sharmalee was acting lawyer for my case with the County and had taken the case over from Holly Rickett. She never informed me before this.

Norm Detels (my contractor) was so mad at Sharmalee for taking advantage of me when my attorney had passed, he filed a complaint against her with the bar association.

The county refused to reinstate the abatement agreement even though I was prepared to do so and had tried to do so in the prior months.

In 2023 I viewed and visited the County Website for PRMD to look at the status of my property, it was then I noticed that were pictures of my arena, trailer, various shots of my personal house, taken from inside my property without my knowledge, consent or exigent circumstances, at ground level (not by a drone), that I have never seen before or even knew existed.

The harassment continued. County PRMD and Code Enforcement spying by drones. In 2019 I was alone on my property in my arena with my dog and heard a buzzing noise above me. I looked up and saw a drone approx. 50 feet above my head just hovering over my head and following me. I was visibly disturbed and frightened at that point.

In early 2020, a similar event happened, about same experience, at that point I was becoming more frightened and thought about getting a gun to shoot down the drone or protect myself. Why would the county want to spy on me or act like a peeping tom?

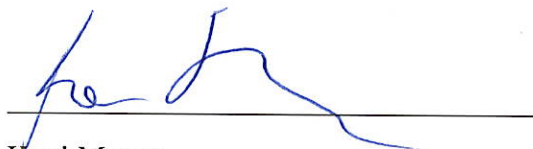
About another week after, same thing happened. I was so mad and disturbed I yelled at the drone and in frustration and yelled "What the F**K, am I that interesting" and opened my shirt and exposed myself to the peeping tom drone.

All of these made me afraid to be alone at my own house on my own property.

I do not know how many times they came out with a drone, and I did not see them. This is very disturbing to be spied on and snooped on by my own government.

I declare under penalty of perjury under the laws of the State of California and the United States that the foregoing is true and correct.

Executed on March 23, 2023.



Keni Meyer

DECLARATION OF FRANCIS GREG STEIL

I, Francis Greg Steil, declare as follows:

1. The matters set forth herein are based on my personal knowledge and if called to testify in this matter, I could and would competently testify thereto.

2. My name is Francis Greg Steil, I live at 414 Hunter Lane Ext, Santa Rosa, CA 95404. I have been in public service my entire adult life. I was a San Francisco Fireman for 32 years and have lived in Sonoma County for most of my adult life. I am a property owner in Sonoma County. I lease out my property to tenants. These matters pertain to my rental property at 6905-6911, 6913 Highway 116 South, Cotati, CA 94931.

On September 7th, 2022, at nine in the morning, my wife received a picture and a phone call from one of my tenants stating that the county had put a violation on the mailbox. At 10:00 AM, I called the number, which was Todd Hoffman. At 11:00 AM, he called me back. I asked him what the problem was. He said that we had an illegal commercial cannabis grower.

I said, "where is the marijuana?" He said, "it was in the greenhouse." I said, "what did you do, walk down the driveway and look in the greenhouse?". He said "no, he saw it on satellite pictures". I said, "What do we have to do?" He said, "You have to remove all the plants. Send him pictures before midnight that day." So, I said, "Okay."

I called my tenant. I told him, "If you had anything there, it had to be removed, had to take pictures and send it to Todd Hoffman." My tenant asked me, "What phone number?" I said, "The phone number that's on the violation." The next day, my tenant called me, told me that the pictures had been taken and sent to the phone number that I told him.

I called Hoffman. I told him that happened. Hoffman called me back. This is around 11 o'clock on the eighth, (next day) in the morning. He said that he never received pictures. I said, "Okay." He said, "What number did you send it to?" I told him the number on the violation. He says, "That's the wrong number," gave me another number. I called my tenant, told my tenant the number. The tenant sent pictures to that number.

Then Todd Hoffman notified me, he had to do a site inspection. I said, "Fine, we'll do it at the beginning of next week." He said, "No, we'll do it Friday, 8:40 in the morning." I was there at 8:40 in the morning.

Hoffman and another inspector (don't know his name) showed up. My tenant Alan Long was there with me. We walked into the greenhouse. Hoffman walked through the greenhouse, took pictures. When he came out of the greenhouse, he said, "Let me in that building." (another structure on site). I said, "No." I said, "I thought you said you saw cannabis with the satellite pictures. What did your satellite see in my building?" I was feeling threatened by them and being violated by then.

Hoffman said, "I don't need anything like that. I can go anywhere I want and do anything I want." I cussed at him. I told him where he could go and told him to "get off my property". He says, "Okay, I will." Hoffman was angry and acting vindictive at this point.

My tenant says, "Let him look in the building." He opened a door, let them look in the building.

Then Todd Hoffman started looking around for other things, talking about, "What about all these non-operative motor vehicles?" That's when I swore at him again, told him to get off my property.

Hoffman said, "Oh, you're going to pay for this. I'm just getting warmed up." Three hours later that day, Friday, September 9th, 2022, Hoffman put two more pages of violations on that property, and he put two more pages of violations on the property next door that I own; for non-operative motor vehicles, construction without permits, 3 ea illegal (don't see how these are illegal) sea train (shipping) containers, junkyard conditions.

So, I and my tenant started to clean the property (for about a month) to try and comply.

I contacted Hoffman and Tyra Harrington (his boss) through emails and asked for an extension of time to remove vehicles and junkyard conditions, and get permits signed off. Tyra Harrington said, "no extensions".

September 29, 2022, I was notified by letter a "notice of abatement" had been recorded on my property. There was no reason to do this, I was complying. I never even got a chance to have a hearing, without notice, or due process to punish me so I couldn't refinance them. This was done as punishment as I was complying with their demands even though I felt their demands were unreasonable and only because I told Hoffman to leave my property.

This resulted in hurting me severely and financially by stopping my refinance of the property. This action caused me financial and emotional difficulties. I continued giving Hoffman and Harrington updates on my progress to clear up violations on my property.

I finished cleaning up the property. Had Hoffman come out again for inspection October 6th, and Hoffman signed off the citations. At the end of reinspection, Hoffman asked me if I had gotten demo permits for the shipping containers? I said "no, I did not. They were put on trailers and hauled off". Hoffman told me he would not sign off on the violations until I got demo permits for the three containers. I went to the County that day and got demo permits because Hoffman still wanted to punish me because I would not allow him to search my property.

Everything was supposed to have been signed off except for paying the fine for the marijuana.

During this time, I was also talking to what they call "Ombudsman" who's job it is to assist and mediate these problems with the County, PRMD and Code Enforcement (where Harrington and Hoffman work). I told him that I had cussed at Hoffman, and he said that "you should not have done that, he is vindictive and that does not help your situation".

After that, when I was in the County offices one day, Tyra Harrington took me out into the meeting room and said to me "OH, we are the bad guys now?" because I had talked to the Ombudsman.

They sent me applications to have the notice of abatement removed from my property. I filled them out, took them up to the County, gave them to Tara Harrington, and she asked me if I paid the marijuana violation. I said, "No, that was not mine." And she goes, "I'm not going to remove these abatements from your deed." Harrington told me to "just pay the fines and go after my tenant to get the money back".

Tyra Harrington and myself we went back and forth with phone calls and emails, and Tyra said that she would drop the fine from \$24,000 to \$16,000 if I paid by Friday. Friday came and went, and we did not pay. I told Tyra Harrington I wanted to appeal the fine, and she came

back with saying that the non-prevailing party will pay court costs. And then she sent me an email stating that court costs would be over \$8,100.

Instead of letting everything snowball and get bigger and bigger, I went up to pay the fine and Tyra Harrington added another \$2,500 for getting ready to go to the appeal hearing on their side (said her costs getting ready for the appeal).

I ended up paying \$18,500 in fines to clear the violation. I felt I was abused and blackmailed or extorted by the County.

Tyra Harrington then finally had the abatement lies removed from my title.

When I paid all the fines including the \$2500 for the abatement hearing, I received a package. I then realized that I had unknown trespass and unreasonable searches without exigent circumstances that were performed at my property without my knowledge or consent, I was not notified nor advised of this until I received a Code Enforcement Division Abatement/Appeal Hearing Report dated January 31, 2023, from the Staff: Todd Hoffman, Jesse Cablk, and Mark Francheschi. This was mailed to me on January 19, 2023 certified 7021 2720 0000 5369 5560.

In this report it states that on January 9, 2018, that if I don't comply . . . (Jesse Cablk) that they would seek an inspection warrant from the Superior Court. I have never been notified of any such warrant. But in the same report there was enclosed 1 each Google Earth satellite photo (Exhibit L) and 7 each 'Drone' photographs, taken without my knowledge, consent or exigent circumstances.

Summer 2020 (photo 2)

June 2021 (photo 3)

August 2021 (photo 4)

October 2021 (photo 5)

July 2022 (photo 6)

September 7, 2022 (photo 7)

September 8, 2022 (photo 10)

3. I have since gone to Sonoma County Superior Court and have been told there NEVER has been an inspection warrant issued regarding my properties at 6905-6911, 6913 Highway 116 South, Cotati, CA 94931.

This is evidence that the County and these actors have been trespassing and continuing to perform unreasonable searches without warrants, exigent circumstances, consent or notifying the land owners of what they do in daily practice.

I declare under penalty of perjury under the laws of the State of California and the United States that the foregoing is true and correct.

Executed on March 23, 2023.

Francis Greg Steil

DECLARATION OF MICHAEL CASTAGNOLA

I, Michael Castagnola, declare as follows:

1. The matters set forth herein are based on my personal knowledge and if called to testify in this matter, I could and would competently testify thereto.

2. My name's Michael Castagnola, I have lived at 12778 DuPont Road, Sebastopol, CA 95472, for 35 years. I raised my family here. I have been a public servant and was Captain of the San Francisco Fire Department for 39 years, living here and commuting to San Francisco. Now I am an elder wishing to enjoy my God given right to retirement and unobstructed use of my property. I consider myself a good citizen of Sonoma County.

I now must worry about the over \$550,000.00 fraudulent abatement liens and the Code Enforcement under the PRMD have caused a receivership to abatement false claims on the property. This process has been methodically engineered to Sonoma County's favor to garner and repossess my property. It is abusive and wrong to witness the lawlessness of how code enforcement agents have operated. I have asked for a meeting with Lynda Hopkins, Supervisor, to seek relief once and for all from this torture.

My tenant and guest were displaced from their home by code enforcement agents, government employees, that were supposed to work to protect and keep safe the people of this County. My story is long and has been going on for a few years beginning after we trusted and allowed Tyra Harrington, Code Enforcement Manager on our land to inspect a false complaint.

Now a supposed inspection that occurred on 4/11/2023 and by the nature of their illegal actions, evicted two persons from their respective residents on my property. There was no notice of any kind that preceded that action that would allow that to occur. Tenants' rights were violated. They were never given notice at all. Who would allow anyone to evict tenants with absolutely zero notice. I know this is illegal on its face because due process was never given.

If I am expected to follow the rules whatever their form takes, why should I not expect these actors to do the same!?

From that moment on we have dealt with her misrepresentation of information, lying and using extortion methods to threaten us into paying excessive fines. I have all the incriminating information and details outlining the lies and extortion with evidence signed under penalty of perjury in document(s).

Back when this began, we tried to seek a remedy, to no avail, from code enforcement agents. Instead, they did everything in their power to sabotage and make it impossible to work in abating our violations. I have felt it is all revenue generated instead of in the interest of solving public and citizen problems.

One of the incidents that clearly shows a pattern of practice, is when my small hoop house under no code requirements needed a permit to build was embellished by Tyra Harrington on the official paperwork as having running water and electrical. Which was falsely recorded and a blatant lie. According to code requirements, the size and footprint of this hoop house didn't need a permit to build and she tried forcing us into paying \$1200 to pull a demolition permit to remove it.

Not only are we dealing with lies and extortion, but she was also forcing us to compromise part of my daughters farming system that she uses for seed germination in the early spring. For years she had a small local farm stand and restaurant accounts, and she's always grown food on our property for our family and community. I live in the fifth district where our supervisor representative Lynda Hopkins says she supports local farmers and is herself a farmer.

In our efforts to abate the current violations, I feel we have proof and documentation in the form of pay stubs and emails that prove all our efforts to work with code enforcement has been mitigated in their favor.

Also I am wondering why the head and code enforcement officers are ex law enforcement agents, with no knowledge of building codes, are put in charge. They strictly come off as revenue agents. It seems people in these positions should be bonded contractors since these matters directly have to do with California building codes and laws.

Also, County of Sonoma by its' Code Enforcement managers by its personnel continue to fly drones to spy and search people's property without warrants, exigent circumstances or just plain manners. It is so frustrating to realize that we are always available to be watched, searched and spied upon by the government without warrants. What is up with this?

After years of dealing with this, I have suffered as two of my tenants and people helping me caretake and manage the land are displaced from their homes by the California Receivership Group and code enforcement agents who were appointed by the Sonoma Superior Court after hearings using false and tainted evidence by County Counsel based on Code Enforcement lies, against me.

This receivership nonsense all started after hearings stated above, and having the Receiver gain illegal entry onto my property, with malicious intent to engage in destruction of property, pulling all the wiring from one of my tenants home office. They also engaged in cutting her water supply with a hack saw cutting into the pipe making the repair exceedingly difficult to reestablish fluidity and compromising her sustenance. They gave us notice with a time and then came on our land two hour prior to their assignment. They arrived wielding their paperwork acting like thugs and gangsters (which we have full video and audio documentation and witnesses). All in the name of "Health and Safety" which is their buzz words to allow them to do what they want.

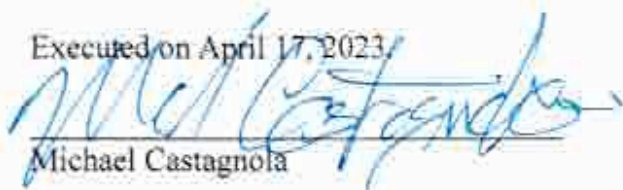
This is happening when the state of California is putting pressure on Sonoma County to allow and provide more housing for displaced individuals being victims and others being ravaged by fire. There have even been a few articles and In a Sonoma county file number #2023-

0224 where there is discussion on allowing different types of manufactured and temporary housing to be left alone.

Plainly put all the actions of this SONOMA COUNTY "GOVERNMENT" WERE ACT OF EXTORTION AND FRAUD.

I declare under penalty of perjury under the laws of the State of California and the United States that the foregoing is true and correct.

Executed on April 17, 2023.



Michael Castagnola